

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: MONICA BORJA, aka : **Chapter 13**
Monica Borja-Rubio, aka Monica Rubio : **Case No.: 19-13024-pmm**
Debtor :

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES Debtor(s) **MONICA BORJA**, by and through their attorneys, FISHER CHRISTMAN, and in Response to the Trustee's Motion to Dismiss avers:

1. Admitted.
2. Admitted.
3. Denied. Debtor has paid \$20,280 to date. Debtor is employed in auto sales in New York City. COVID-19 has reduced Debtor's income to subsistence levels. Nonetheless, Debtor anticipates filing a Motion to Modify Plan in the near future to cure the Plan payment default and extend her Plan period pursuant to 11 U.S.C. § 1329(d) to increase feasibility.

WHEREFORE, Debtor(s) **MONICA BORJA** respectfully prays this Honorable Court for an Order that the Trustee's Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER CHRISTMAN

By: /s/ J. Zac Christman
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